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Attorney for Plaintiff, Thomas A. Michalski

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

**THOMAS A. MICHALSKI,**

Plaintiff,

v.

**CAROLYN W. COLVIN,**

Acting Commissioner of  
 Social Security,

Defendant.

Case No.: 3:15-cv-4483-EMC

**PLAINTIFF'S MOTION FOR EXTENSION OF  
 TIME IN WHICH TO FILE PLAINTIFF'S MOTION  
 FOR SUMMARY JUDGMENT and ~~PROPOSED~~  
 ORDER**

Pursuant to N.D.C.A Civil Local Rule 6, Plaintiff, by and through undersigned counsel, respectfully moves this Court for an enlargement of time of 30 days, up to and including July 9, 2016 in which to file Plaintiff's Motion for Summary Judgment. On June 5, 2016, the undersigned counsel emailed with both Mr. Rodriguez, SSA Assistant Regional Counsel and also Mr. Win, who is the Supervising SSA Attorney, and requested a stipulation agreeing to extend Plaintiff's time for filing his Motion for Summary Judgment by 30 days from June 9, 2016 to July 9, 2016; Mr. Rodriguez and Mr. Win said that Defendant would not oppose Plaintiff's motion to extend time.

This extension is necessary to provide further opportunity for review and analysis of this case, as undersigned counsel was not the original attorney on the case and is in the process of exploring the possibility of Request for Voluntary Remand in order to avoid further litigation in this case. Plaintiff does not believe

1 that Defendant will be prejudiced by his delay. This is further evidenced by the Defendant's declining to  
2 oppose this Motion. This is Plaintiff's second request for an extension.

3  
4 I declare under penalty of perjury that the facts recited above are true and correct. Executed this seventh day  
5 of June 2016 in San Francisco, CA.

6  
7 By "/s/ Dolly M. Trompeter"  
8 DOLLY M. TROMPETER, ESQ.  
9 Attorney for Plaintiff  
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11 IT IS SO ORDERED that Plaintiff shall have an additional 30 days in which to file his motion for summary  
12 judgment, up to and including JULY 9, 2016.

13  
14 Dated: 6/8/16  
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